

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

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JENNIFER D. ARAOZ,

Plaintif,

v.

**THE NEW ALBANY COMPANY, LLC, et
al.,**

Defendants.
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**NOTICE OF MOTION
No. 1:22-cv-00125 (AMD) (RML)**

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law and Declaration of Marion H. Little, Jr. dated March 14, 2024 and all exhibits attached thereto, Defendants The New Albany Company, LLC, The Wexner Family Charitable Fund, The YLK Charitable Fund, Abigail S. Wexner, The Wexner Foundation, and Leslie H. Wexner, will move this Court, before the Honorable Ann M. Donnelly, United States District Court Judge, at the United States Courthouse, 225 Cadman Plaza E, Brooklyn, NY 11201 on a date set by the Court, for an order pursuant to Federal Rule of Civil Procedure 11 and 28 U.S.C. § 1927 imposing sanctions on Plaintiff's Counsel and awarding attorneys' fees and other expenses incurred (in an amount not to exceed \$50,000) by Defendants in having to defend against Plaintiff's frivolous complaint that was barred by res judicata and against Plaintiff's memorandum in opposition to Defendants' motion to dismiss that lacked a good faith basis in law and fact.

PLEASE TAKE FURTHER NOTICE that Plaintiff's opposition papers and Defendants' reply papers shall be served in accordance with Local Rule 6.1.

Dated: March 14, 2024

Respectfully submitted,

/s/ Marion H. Little, Jr.

Marion H. Little, Jr. (Ohio Bar # 0042679)

Admitted pro hac vice

Matthew S. Zeiger (Ohio Bar #0075117)

Admitted pro hac vice

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